1	Case 23-12312-SDM Doc 51 Filed 07/24/25 Entered 07/24/25 15:08:27 Desc Main Document Page 1 of 6
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4	UNITED STATES BANKRUPTCY COURT
5	NORTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 23-12312-SDM
7	CONSTANCE ERVING WADE DECLARATION OF MAILING CERTIFICATE OF SERVICE
8	Chapter: 13
9	
10	
11	On 7/24/2025, I did cause a copy of the following documents, described below,
12	Notice and Motion to Suspend
13	
14	
15	
16	
17	
18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
21	com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
22	fully set forth herein. Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system. DATED: 7/24/2025
24	/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr. 103469
25	Attorney at Law The Rollins Law Firm
26	702 W. Pine Street Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
28	

Case 23-12312-SDM Doc 51 Filed 07/24/25 Entered 07/24/25 15:08:27 Desc Main Document Page 2 of 6 1 2 3 UNITED STATES BANKRUPTCY COURT 4 NORTHERN DISTRICT OF MISSISSIPPI 5 IN RE: CASE NO: 23-12312-SDM 6 **CERTIFICATE OF SERVICE** CONSTANCE ERVING WADE **DECLARATION OF MAILING** 7 Chapter: 13 8 9 10 11 On 7/24/2025, a copy of the following documents, described below, Notice and Motion to Suspend 12 13 14 15 16 17 18 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient 19 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth 20 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above 21 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief. 22 DATED: 7/24/2025 23 24 25 Miles Wood BK Attorney Services, LLC 26 d/b/a certificateofservice.com, for Thomas C. Rollins, Jr. 27 The Rollins Law Firm 702 W. Pine Street

Hattiesburg, MS 39401

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USPS FIRST Cases 23:12:312:cSDMTs: Doc 51 Filed 07/24/25 Entered 07/24/25 15:08:27 Desc Main

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING 05371 CASE 23-12312-SDM NORTHERN DISTRICT OF MISSISSIPPI ABERDEEN THU JUL 24 12-59-13 CDT 2025

CAPITAL ONE ATTN BANKRUPTCY PO BOX 30285 SALT LAKE CITY UT 84130-0285 CAPITAL ONE AUTO FINANCE ATTN BANKRUPTCY 7933 PRESTON RD PLANO TX 75024-2302

CAPITAL ONE AUTO FINANCE A DIVISION OF CAPITAL ONE AUTO FINANCE A DIVISION OF CAPITAL ONE NA AIS PORTFOLIO SERVICES LLC 4515 N SANTA FE AVE DEPT APS OKLAHOMA CITY OK 73118-7901

CAPI 4515 N SANTA FE AVE DEPT APS OKLAHOMA CITY OK 73118-7901

BY AMERICAN INFOSOURCE AS AGENT PO BOX 71083 CHARLOTTE NC 28272-1083

CAPITAL ONEWALMART ATTN BANKRUPTCY PO BOX 30285 SALT LAKE CITY UT 84130-0285

CHASE AUTO FINANCE ATTN BANKRUPTCY PO BOX 901076 FORT WORTH TX 76101-2076 CREDIT ACCEPTANCE ATTN BANKRUPTCY $25505\ \text{WEST}\ 12\ \text{MILE}\ \text{ROAD}\ \text{STE}\ 3000$ SOUTHFIELD MI 48034-8331

FOURSIGHT CAPITAL LLC PO BOX 45026 SALT LAKE CITY UT 84145-0026 FOURSIGHT CAPITAL LLC ATTN BANKRUPTCY PO BOX 45026 SALT LAKE CITY UT 84145-0026

JPMORGAN CHASE BANK NA NATIONAL BANKRUPTCY DEPARTMENT PO BOX 29505 AZ1-5757 PHOENIX AZ 85038-9505

EXCLUDE

JOHNS CHAPTER 13 TRUSTER PRANDON MS

MISSISSIPPI SPORTS MEDICINE AND ORTHOP CO WAKEFIELD ASSOCIATES LLC 201 E SOUTH ST PO BOX 51272 KNOXVILLE TN 37950-1272

MAY ERVING KOSCIUSKO MS 39090-4507

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SYNCHRONY BANK CO AIS PORTFOLIO SERVICES LLC
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SYNCHRONY BANK CO AIS PORTFOLIO SERVICES LL 4515 N SANTA FE AVE DEPT APS OKLAHOMA CITY OK 73118-7901

USPS FIRST Cases 23:12:312:SDMTS: Doc 51 Filed 07/24/25 Entered 07/24/25 15:08:27 Desc Main Parties with names struck through or labeled TOCCUMENT CE WPage 4:01 % via First Class USPS Mail Service.

SYNCHRONY BANKCARE CREDIT ATTN BANKRUPTCY DEPT PO BOX 965064 ORLANDO FL 32896-5064 THE SURGERY CENTER AT MISSISSIPPI SPORTS
CO WAKEFIELD ASSOCIATES LLC PO BOX 51272
KNOXVILLE TN 37950-1272

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

TOWER LOAN OF MISSISSIPPI LLC PO BOX 320001 FLOWOOD MS 39232-0001

(P)TRUSTMARK NATIONAL BANK P O BOX 1928
BRANDON MS 39043-1928

TRUSTMARK NATIONAL BANK CO JAMES ELDRED RENFROE RENFROE PERILLOUX PLLC 648 LAKELAND EAST SUITE A FLOWOOD MS 39232-9574

U S ATTORNEY NORTHERN DISTRICT OF MISSISSIPPI 900 JEFFERSON AVENUE OXFORD MS 38655-3608 (P)UNITED STATES SMALL BUSINESS ADMINISTRATIO
ATTN LOUISIANA DISTRICT OFFICE 500 POYDRAS STREET SUITE 828
NEW ORLEANS LA 70130-3374

EXCLUDE

O S TRUSTEE 501 EAST COURT STREET SUITE 6430 JACKSON MS 39201-5022

(P)US DEPARTMENT OF HOUSING AND URBAN DEVELOP ATTN ROBERT ZAYAC 40 MARIETTA ST SUITE 300 ATLANTA GA 30303-2812

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WASHINGTON DC 20530-0001

DEBTOR

CONSTANCE ERVING WADE 1031 HICKORY RIDGE DR KOSCIUSKO MS 39090-4231

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE: Constance Erving Wade, Debtor

Case No. 23-12312-SDM

CHAPTER 13

MOTION TO SUSPEND PLAN PAYMENTS

COMES NOW, Debtor, by and through counsel, and moves this Court to suspend their Chapter 13 plan payments, and in support thereof, would show the Court as follows:

- 1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
- 2. Debtor's 2017 Dodge Challenger ("Vehicle") is in need of repair. The estimated cost for repairs is approximately \$3,977.33.
- 3. Debtor is requesting this Honorable Court to suspend any past due plan payments and one (1) month of plan payments, including any ongoing mortgage payments being paid through the plan, during the month of August 2025, so those funds will be available to pay for her needed Vehicle repairs.
- 4. Debtor wishes to resume making plan payments beginning in September 2025.
- 5. Debtor is requesting that her Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Suspend Plan Payments was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.